UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GA 30303-8960

June 30, 2003

4WD/FFB

Commanding Officer
Attn: Jim Reed
Code 1872
SOUTHNAVFACENGCOM
2155 Eagle Drive
North Charleston, South Carolina 29419-9010

Subject: Corrective Measures Study Report, AOC A - Northside Fluvial Deposits Groundwater, Revision: 1, Naval Support Activity Mid-South, Millington, Tennessee

Dear Mr. Reed,

The Environmental Protection Agency (EPA) has completed review of the subject document. EPA agrees that Alternative 2: Enhanced In Situ Bioremediation is the best alternative for remediating the AOC A fluvial deposits groundwater. Please find enclosed EPA's comments on the report.

If you would like to discuss these comments or have any questions please contact me at 404-562-8513.

Sincerely,

Jennifer Tufts
Remedial Project Manager

cc: Rob Williamson, Public Works Office
Roger Donovan, TDEC - Nashville
John Stedman, Ensafe - TOM
Jack Carmichael, USGS

Corrective Measures Study Report AOC A - Northside Fluvial Deposits Groundwater
Revision: 1
Naval Support Activity Mid-South, Millington, Tennessee

Section 3.2 AOC A Groundwater Remedial Goal Options. The text states that the remedial goals for groundwater are MCLs. MCLs are appropriate where the residual risk or cumulative risk of constituents present in groundwater does not exceed 10E-4. However, if multiple constituents are present at a point of compliance well that causes the cumulative risk to exceed 10E-4, the remediation goals should be modified to fall within the 10E-4 to 10E-6 risk range.

Page 5-46 System Design. The text describes and illustrates the system design which is appropriate for addressing the hot spot areas and areas down gradient of the hot spot areas. In addition, groundwater contamination beyond the property line should be addressed. Based on the past few sampling events, chlorinated solvent concentrations continue to increase in wells beyond the property boundary. The CMS should mention that a plan for addressing off-site contamination will be developed if the BCT determines that action is needed based on sampling results. Implementing the enhanced in-situ bioremediation at the property boundary is a viable remedy if deemed necessary.

Page 5-49 states that wells along the perimeter of the plume will be sampled annually. Because contaminant concentrations continue to increase along the perimeter of the plume which is beyond the property boundary, the wells should be sampled on the same schedule as the targeted area. Sampling frequency should continue until monitoring data indicate the plume is no longer migrating off-site.